REMARKS

In paragraph 5 of the final Office Action mailed 04/02/2005, the Examiner suggested that in claim 38, the term "the left left upper block" be changed to "the left upper block". Applicants have amended claim 38 as indicated above to adopt this suggestion and to put the claim in better condition for appeal. Claims 1, 30-31, 37-39, 44-52 and 54-61 remain pending in this application. Applicants submit that the duplicate use of the word "left" in the earlier language of claim 38 was an obvious typographical error. Applicants further submit that no new matter has been introduced by reason of this amendment.

Starting at paragraph 6 of the final Office Action, the Examiner rejected claims 1, 30-31, 37-39, 44-52 and 54-61 (all of the pending claims) under 35 U.S.C. §103(a) as being unpatentable over Kuriacose in view of Graham.[1] Applicants traverse this rejection and submit that the current claims are not obviated by the cited references. Applicants submit herewith the following exhibits:

1. International Organization for Standardization Organisation Internationale De Normalisation ISO/IEC JTC1.SC29/WG11, Coding of Moving Pictures and Associated Audio Information, by Sang-Hee Lee, Jae kyoon Kim (KAIST), Joo-hee Moon(Hyundai), July 1996 (Exhibit 1), which demonstrates that the video coding scheme of the present invention was superior to other coding schemes known at that time.

2. U.S. Patent Office patent database search results for the search terms "video" and "dct" and "dc coefficient" showing the earliest 30 of 580 patents identified (Exhibit 2), which shows that quite a bit of work has been done in this area in recent years.

3. U.S. patent 4,953,020 (De With) (Exhibit 3) which is the first patent to issue of the patents identified in the search of Exhibit 2, which illustrates that patents on use of DCT in video coding were first filed in the 1980's. De With was filed in the US in 1989.

[1] U.S. Patents 5,111,292 and 2,905,756; final action page 6.

As illustrated by Exhibit 1, Applicants submit that the present invention is a significant advancement in predicting DC coefficients or DC values of blocks of video code. In addition, as illustrated by Exhibit 2, many patents have been filed in the area involving the use of DCT and DC coefficients in video coding. In fact, 580 patents were identified in the key word search presented. However, the earliest of these patents to issue, De With (Exhibit 3) was not filed in the US until 1989.

Applicants further submit that Graham was filed long before the use of DCT or the problem of predicting DC coefficients or DC values. If the references and the claimed invention are considered as a whole, there would have been no motivation at the time of the invention to look to Graham for a solution to the problem of how to better predict DC coefficients or DC values and there would have been no reasonable expectation of success associated with such an inquiry. In addition, Graham teaches away from DCT on blocks of data since Graham deals with pixels individually in a time domain, and if Graham were modified to arrive at the present invention, such a modification would change the principle of operation of Graham. Even if it had been obvious that better prediction of DC coefficients or DC values would be beneficial, it was not obvious to look to Graham for a solution to this problem, or to try Applicants particular solution to the problem. Consequently, the combination of the cited references would not have been obvious at the time of the invention and the cited references do not obviate the present invention. Reconsideration and allowance of all pending claims is requested.

If the Examiner has any questions regarding this paper, please contact the undersigned attorney.

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P.O. Box. 1450 Alexandria, VA 22313-1450, on July 5, 2005.

Judy Hayman

Respectfully submitted,

By: _____

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